



U.S. Department of Justice

United States Attorney
Southern District of New York

Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

June 4, 2025

BY ECF

The Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Bekim Fiseku*, 15 Cr. 384 (PAE)

Dear Judge Engelmayer:

The Government submits this letter to respectfully request that chronologies maintained by the United States Probation Office (“Probation”), detailing Bekim Fiseku’s supervision from September 2023 to the present, be unsealed by the Court so that Probation may provide them to the parties ahead of the June 24, 2025 violation of supervised release hearing currently scheduled in the above-captioned case (the “VOSR Hearing”). The pending VOSR matter involves seven specifications arising from and relating to a reported burglary and subsequent flight that occurred on or about October 22, 2024 (Specifications 1 through 7). Given the nature of the specifications, the Government may call a Probation Officer to testify at the VOSR Hearing.

The chronologies maintained by the United States Probation Office contain material relevant to the hearing, and the Government understands that they may be unsealed only upon a Court order. In addition, once in possession of the files, the Government will disclose them to the defendant pursuant to Title 18, United States Code, Section 3500 and/or pursuant to its obligations under *Brady v. Maryland*, 373 U.S. 83 (1963) and *Giglio v. United States*, 405 U.S. 50 (1972). Accordingly, the Government respectfully requests that the chronologies be ordered unsealed.

Respectfully submitted,

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by: 

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cc: Counsel of Record (by ECF)